

REMARKS/ARGUMENTS

Claims 1-38 are pending in the present application. Claims 6-8, 13-15, 25-27, and 32-34 were canceled; claims 1, 9, 16, 20, 28, and 35-36 were amended; and claims 37-38 were added. Support for the amendments to the claims can be found at least in the canceled dependent claims, in the specification on at least p. 13, l. 31 – p. 14, l. 16, and in original figure 4. Support for the newly added claims can be found in original figure 6. Reconsideration of the claims is respectfully requested.

I Interview Summary

Applicants thank Examiner Kyle R Stork for the courtesies extended to Applicants' representatives during the July 27, 2006 telephone interview. During the interview, Applicants' representatives sought suggestions from the Examiner to advance the prosecution in the present case. The Examiner suggested amending the claims by further defining the claim feature "set of rules" on the basis of figures 4 and 6 in order to overcome the presently cited prior art. The Examiner stated that in the opinion of the Examiner and his primary, amendments of this nature would overcome the presently cited prior art. No agreement was reached as to the allowability of the claims thus amended.

II 35 U.S.C. § 103, Obviousness

The examiner has rejected claims 1, 6-8, 20, 25-27, and 35 under 35 U.S.C. § 103 as being unpatentable over *Gipson*, Method and system for autoformatting a document using an event-based rule engine to format a document as the user types, United States Patent No. 5,778,402 (issued, July 7, 1998) (hereinafter, "*Gipson*"), in view of *Mansfield*, Ron Mansfield, Mastering Word 97 (4d ed. 1997) (hereinafter "*Mansfield*"). This rejection is respectfully traversed.

The examiner has rejected claims 1, 6-8, 20, 25-27, and 35 stating:

As per independent claim 1, *Gipson* discloses a method in a data processing system for modifying original content of a document, the method comprising:

Receiving a request for modified content (column 4, lines 35-41: Here, a request is an user input event)

In response to each receipt of the request, modifying the original content, using a set of rules to modify selected content in the document without degrading readability of the document, to form, a modified document, wherein unmodified content in the modified document retaining its original physical and spatial characteristics after a portion of the content is modified (column 4, lines 42-50: Here, the set of rules defines an auto-format content. A user input event that meets a set of rules, activates an auto-format, thus generating modified content and similarly a modified document; column 7, lines 1-12: Here, an example of an auto-format is disclosed. Further, only the "*" is modified. The following word, and its physical and spatial characteristics remain unmodified)

Displaying the modified document having the original physical and spatial characteristics for the unmodified content (column 7, lines 1-12) Although *Gipson* fails to specifically disclose rules for making text invisible, *Gipson* suggests that a document may include invisible text (column 11, lines 50-58: Here, the concept of hidden or invisible text within a document is disclosed). However, *Gipson* fails to specifically disclose invisible text. However, *Mansfield* discloses invisible text (pages 93-94: Here, text, including paragraph marks, dots denoting spaces, and arrows denoting tab characters, are hidden from a user by clicking on the Show/Hide button on the toolbar). Further, *Mansfield* teaches rules for determining which text should be invisible (pages 93-94: Here, text characters that are not paragraph marks, dots denoting spaces, arrows denoting tab characters, dashed lines for pages, section, and column breaks, and text and graphic boundaries are hidden). It would have been obvious to one of ordinary skill in the art at the time of the applicant's invention to have combined *Gipson*'s use of a rules engine with *Mansfield*'s use of invisible text, since it would have allowed for a document to be auto-formatted based upon user entries.

Gipson fails to specifically disclose wherein the selected content in the document being made invisible increases a speed at which a user can read the modified document relative to a speed at which the user can read the document without modifications. However, one of ordinary skill in the art at the time of the applicant's invention would have recognized that, all else being equal, the relative speed at which a user can read a document is at least partially related to the number of words within a document. Therefore, by reducing the number of words in a document the relative reading speed of the document by the user would subsequently increase.

Office action dated June 13, 2006, pp. 2-4.

Claims 6-8, which depend from claim 1 have been canceled. Features of canceled claims 6-8 are now reflected in the amended claim 1. Therefore, applicants address the examiner's rejection of independent claim 1 and canceled dependent claims 6-8 together. As to claims 6-8, the examiner states:

As per dependent claim 6, *Gipson* and *Mansfield* disclose the limitations similar to those in claim 1, and the same rejection is incorporated herein. *Gipson* further discloses a set of rules (column 4, lines 42-50) and the ability for text to be invisible (column 11, lines 50-58). It would have been obvious to one of ordinary skill in the art at the time of the applicant's invention to have combined *Gipson*'s use of a rules engine with *Gipson*'s use of invisible text, since it would have allowed for a document to be auto-formatted based upon user entries (abstract).

As per dependent claim 7, *Gipson* and *Mansfield* disclose the limitations similar to those in claim 1, and the same rejection is incorporated herein. *Gipson* further discloses the set of rules including rules to retain words (Figure 5: Here, if a word does not trigger an action, then the word is retained).

As per dependent claim 8, *Gipson* and *Mansfield* disclose the limitations similar to those in claim 1, and the same rejection is incorporated herein. *Gipson* further discloses the set of rules includes rules to replace words (Figure 5; column 7, lines 1-12).

Office action dated June 13, 2006, pp. 4-5.

Arguments advanced below as to the amended claim 1 are similarly applicable to the amended independent claims 20 and 35 for the purpose of this rejection. The *Gipson* and *Mansfield* references, considered separately or together as suggested by the examiner do not make obvious all the features of claim 1 as amended. Amended claim 1 recites:

A method in a data processing system for modifying original content of a document, the method comprising:
receiving a request for modified content;
in response to each receipt of said request, modifying said original content, using a set of rules to make selected content in said document invisible without degrading readability of said document to form a modified document, wherein rules in the set of rules comprise one of a rule to make words invisible, a rule to retain words, and a rule to replace words, wherein one or more rules are selected from the set of rules to form a word policy, wherein one or more word policies are associated with one or more users and stored in a word policy database, wherein unmodified content in said modified document retaining its original physical and spatial characteristics after a portion of said content is modified, and wherein the selected content in the document being retained, replaced, or made invisible increases a speed at which a user can read the modified document relative to a speed at which the user can read the document without modifications; and
displaying said modified document having said original physical and spatial characteristics for the unmodified content.

Gipson and *Mansfield* fail to teach or suggest, “wherein rules in the set of rules comprise one of a rule to make words invisible, a rule to retain words, and a rule to replace words,” and “wherein one or more rules are selected from the set of rules to form a word policy, wherein one or more word policies are associated with one or more users and stored in a word policy database.”

A *prima facie* case of obviousness is established when the teachings of the prior art itself suggest the claimed subject matter to a person of ordinary skill in the art. *In re Bell*, 991 F.2d 781, 783, 26 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1993). All limitations of the claimed invention must be considered when determining patentability. *In re Lowry*, 32 F.3d 1579, 1582, 32 U.S.P.Q.2d 1031, 1034 (Fed. Cir. 1994). In the case at hand, not all of the features of the claimed invention have been considered and the teachings of the references themselves do not suggest the claimed subject matter to a person of ordinary skill in the art.

Gipson as well as *Mansfield* are devoid of any teaching or suggestion of selecting one or more rules from the set of rules to form word policy. Further, *Gipson* and *Mansfield* are both devoid of any teaching or suggestion that one or more word policies may be associated with one or more users. Furthermore, *Gipson* and *Mansfield* are also devoid of any teaching or suggestion that a database is used for storing the word policies and their associations with users. The amended claim 1 recites, “one or more rules are selected from the set of rules to form a word policy,” “one or more word policies are associated

with one or more users,” and “stored in a word policy database.” As noted above, at least these three features of claim 1 are neither taught nor suggested in the amended claim 1.

The examiner makes a contradicting statement in rejecting claims 1 and 6. In rejecting claim 6, the examiner states, “*Gipson* further discloses a set of rules (column 4, lines 42-50) and the ability for text to be invisible (column 11, lines 50-58). It would have been obvious to one of ordinary skill in the art at the time of the applicant’s invention to have combined *Gipson*’s use of rules engine with *Gipson*’s use of invisible text, since it would have allowed for a document to be auto-formatted based upon user entries (abstract)” from previous page 10. In rejecting claim 1 the examiner states, “Although *Gipson* fails to specifically disclose rules for making text invisible, however, *Gipson* suggests that a document may include invisible text (column 11, lines 50-58: Here, the concept of hidden or invisible text within a document is disclosed). However, *Gipson* fails to specifically disclose invisible text.” Applicants address each contradicting rejection in turn. The examiner cites to the following section of *Gipson* as teaching a set of rules and ability to make text invisible:

By passing events to the event engine 52, the event monitor causes events and rules to be scheduled for evaluation. The event monitor 50 calls the rule-based event engine 52 to evaluate the rules and events scheduled in an interval section of the rule-base 58. As a result of this evaluation, the event engine 52 can cause delayed actions to be generated to carry out an autoformat rule. If any autoformat rules apply, the event monitor 50 is responsible for issuing calls to the appropriate functions to carry out these delayed actions.

The character position data includes the starting character position of the token in the line format buffer and in the document file. It also includes the range of effect, or length of the token in both. Character position data for both the line format buffer and the document is included because the character positions can be different due to such things as created text, display fields etc. that appear in the line format buffer but not in the document, or hidden text, which is text that appears in the document but not the line format buffer.

Gipson, col. 4, ll. 42-50; col. 11, ll. 50-58.

Gipson teaches event-triggered invocation of auto-formatting rules but provides no teaching as to what these auto-formatting rules are. *Gipson* provides the following definition of the auto-formatting rules:

The rules are expressed in terms of a number of events that must occur before an action is taken such as scheduling one or more additional events or rules, or executing code. These events are expressed in terms of variables, and the conditions of a rule are logical expressions using these variables as arguments. The rule can, for example, specify part of a sequence of events that must occur using logical connectors. The rule can also define a number of conditions in terms of logical operators including “and,” “not,” and “or,” as well as check global state within the document or word processor, or call functions.

One example of a high level autoformat feature is where the system deduces that the user is creating a bulleted list, and then automatically formats the document. Not knowing how to invoke a format feature, a typical user may use an asterisk. For example, the user may create a list by typing an "*" as the first character of a paragraph, followed by a space and then followed by a word. A pseudo code rule to automatically format these characters would be: if a line begins with an "*" followed by a white space, followed by a word, then change the asterisk to a bullet and invoke auto-bullet mode. In source code, this abstract rule is written in terms of a series of sequence rules.

Gipson, col. 6, l. 57 – col. 7, l. 12.

Only a general and indirect definition of the auto-formatting rules appears in the above-quoted paragraph. *Gipson* defines these rules in terms of events that trigger them, and not the contents of the rules themselves. Further, *Gipson* provides no definition of the term "events" that trigger these rules. Therefore, the one exemplary event in *Gipson*, notwithstanding any conceivable event, could potentially fall under the *Gipson* disclosure. Therefore, *Gipson*'s events could arguably include hardware events, software events, user events, network events, administrative events, security events, planning events, as well as social events without a specific definition of the term "events." Hence, the term "events" in *Gipson* becomes all encompassing for a person of ordinary skill in the art without a clear definition. Furthermore, all imaginable types of events could trigger all imaginable types of rules without limitations. Clearly, *Gipson* cannot be interpreted to have a scope that wide. Even in the subject matter domain of document editing, a user event could involve, for example, changing the color of the document background. Such an event is clearly not addressed by the *Gipson* invention, yet appears to be covered by the *Gipson* disclosure due to lack of definitions.

Therefore, unless *Gipson* provides clear definition whether *Gipson*'s auto-format rules are meant to include rules to make words invisible, rules to retain words, and rules to replace words, simply eluding to event-triggered auto-formatting rules does not teach or suggest any specific rule, including these rules. Claim 1 as amended recites specific rules - rules in the set of rules comprise one of a rule to make words invisible, a rule to retain words, and a rule to replace words – as a feature of the claim. For this reason, *Gipson* cannot be extrapolated to teach or suggest, "wherein rules in the set of rules comprise one of a rule to make words invisible, a rule to retain words, and a rule to replace words" feature of claim 1.

Furthermore, nothing in *Gipson*, including the cited section, teaches selected content in a document being made invisible. The cited section in *Gipson* teaches character position data for both a line format buffer and a document, including the starting character position and the range of the effect. The character position data may be different for the line format buffer and the document because a line of created text may appear in the line format buffer but not in the document, and "hidden text" may appear in the document but not in the line format buffer.

Gipson teaches character position data for a line of created text that appears in the line format buffer but not in the document because the character position data for the line of created text is evaluated in the line format buffer before the line of created text is automatically formatted for the document. When the character position data for line of created text is evaluated for formatting, the line of created text appears in the line format buffer, but this line of created text does not appear in the document.

Gipson teaches character position data for “hidden text” that appears in the document but not in the line format buffer because the line of created text that has been formatted for the document becomes “hidden” from the perspective of the line format buffer when the line of created text appears in the document and the line of created text no longer appear in the line format buffer. After a line of created text and its character position data have been evaluated and formatted for the document, the line format buffer evaluates and formats the next line of created text and its character position data. When the next line of created text appears in the line format buffer, the previous line of created text no longer appears in the line format buffer. This lack of appearance of the previous line of created text in the line format buffer means the previous lines of created text is then considered “hidden text.” However, this line of created text is hidden only from the perspective of the line format buffer. Because the line of created text appears in the document, this line of created text is not invisible. The line of created text is disclosed as text that does not appear invisible in the document when *Gipson* offers the definition of “hidden text” as follows - “hidden text, which is text that appears in the document.”

The Examiner alleges that when *Gipson* mentions “hidden text,” that this only use of the word “hidden” in the *Gipson* patent discloses selected content in a document being made invisible. However, *Gipson* never mentions the word “hidden” elsewhere, or suggests the word “invisible” anywhere, because *Gipson* has no reason to hide text or make selected content invisible in a document.

Next, in a statement contradicting the examiner’s own rejection of claim 6 described above, the examiner concedes that *Gipson* fails to specifically disclose invisible text, and fails to teach or suggest rules for making text invisible. The examiner cites to *Mansfield* for finding support for invisible text and rules for making text invisible. The examiner cites the following section from *Mansfield*:

Showing Paragraph Marks, Spaces, and Other Nonprinting Characters

Word can display helpful nonprinting characters to let you see what’s going on. Examples include:

- Paragraph marks (¶)
- Dots denoting spaces

- Arrows denoting tab characters
- Dashed lines for page, section, and column breaks
- Text and graphic boundaries

I like to leave these on, although turning them off can sometimes help you better visualize the final appearance of a document. To toggle the display of these items, click on the Show/Hide ¶ button on the Standard toolbar.

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Mansfield, pp. 93-94.

Contrary to the examiner's assertion, *Mansfield* also fails to teach "rules to make words invisible" as recited in the amended claim 1. *Mansfield* clearly states in the title of the section cited by the examiner, "Showing paragraph marks, spaces, and other nonprinting characters." The paragraph then describes the procedure for showing and hiding those nonprinting characters. However, nonprinting characters are not "words" by the commonly understood definition of the word "word," which means a readable composition of characters with a language specific meaning to the reader. A readable word is by its very nature also printable. Therefore, nonprinting characters are not words. Therefore, procedures describing hiding of nonprinting characters do not automatically extend to printable words "without degrading readability" of a document. Claim 1 particularly points out that the original document is modified "without degrading readability" by the application of the set of rules recited above. Therefore, *Mansfield* does not teach or suggest, "rules to make words invisible" as recited in the amended claim 1.

Therefore, the rejection of claim 1 under 35 U.S.C. § 103(a) has been overcome. Independent claims 20 and 35 contain features similar to those in independent claim 1, and the rejection of those claims has also been overcome by the same reasoning. Claims 6-8 and 25-27 stand canceled. Therefore, the rejection of claims 1, 6-8, 20, 25-27, and 35 under 35 U.S.C. § 103(a) has been overcome.

The examiner has rejected claims 2-4, 9-11, 13-23, 28-30, and 32-34 under 35 U.S.C. § 103(a) as being unpatentable over *Gipson*, in view of *Mansfield*, and further in view of *Belanger et al.*, Remote home page authoring system, United States patent application publication (published September 6, 2001), (hereinafter "*Belanger*"). This rejection is respectfully traversed.

The examiner has rejected claims 2-4, 9-11, 13-23, 28-30, and 32-34 stating:

As per dependent claim 2, *Gipson* and *Mansfield* discloses the limitations similar to those in claim 1, and the same rejection is incorporated herein. *Gipson* fails to specifically disclose the method wherein the document is a web page. However, *Belanger* discloses a web page (paragraph 0007: Here, a portion of a web site is a web page).

It would have been obvious to one of ordinary skill in the art at the time of the applicant's invention to have combined *Gipson*'s method with *Belanger*'s

method, since it would have allowed a user to remotely author and modify documents (*Belanger*: paragraphs 0007-0008).
Office action dated June 13, 2006, pp. 5-6.

Arguments advanced as to claim 2 below are also similarly applicable to claims 3-4, 10-11, 13-15, 17-19, 21-23, 29-30, and 32-34. Claim 2 depends from the independent claim 1, which Applicants have shown is not made obvious by *Gipson* and *Mansfield*, above. Claim 2 recites:

The method of claim 1, wherein the document is a web page.

At least by virtue of the fact that claim 2 depends from claim 1, claim 2 is also not made obvious by *Gipson* and *Mansfield* by similar reasoning. Furthermore, *Belanger's* entire disclosure fails to cure the deficiencies in *Gipson* and *Mansfield* highlighted above. Therefore, *Gipson*, in view of *Mansfield* and *Belanger* fails to teach or suggest all features of claim 2. Consequently, the rejection of claims 2-4, 10-11, 13-15, 17-19, 21-23, 29-30, and 32-34 under 35 U.S.C. § 103(a) has been overcome.

Independent claims 9, 16, 20, 28, and 36 contain features similar to those in independent claim 1. Claim 9 is representative of independent claims 16, 20, 28, and 36, and recites:

A method in a data processing system for altering original content for a web page containing a set of words, the method comprising:
receiving a request to alter the original content of said web page;
in response to each receipt of said request, altering said original content by reducing the set of words in the web page to generate a modified content of said web page to make some of said set of words invisible without degrading readability of said web page to form an altered web page, wherein rules in the set of rules comprise one of a rule to make words invisible, a rule to retain words, and a rule to replace words, wherein one or more rules are selected from the set of rules to form a word policy, wherein one or more word policies are associated with one or more users and stored in a word policy database, wherein unaltered content in said altered web page retaining its original physical and spatial characteristics after a portion of said original content is altered, wherein the set of words is reduced by making said some of said set of words invisible using a set of rules, wherein said set of words in the web page being retained, replaced, or made invisible increases a speed at which a user can read the altered web page relative to a speed at which the user can read the web page without alterations; and wherein the set of words in the modified web page retains key words allowing identification of the content of the web page.

Applicants have shown above that *Gipson*, in view of *Mansfield*, does not teach or suggest all features of claim 1. By the same reasoning, *Gipson*, in view of *Mansfield*, does not teach or suggest all features of claims 9, 16, 20, 28, and 36 as well. Furthermore, *Belanger's* entire disclosure fails to cure the deficiencies in *Gipson* and *Mansfield* highlighted above. Therefore, *Gipson*, in view of *Mansfield* and *Belanger* fails to teach or suggest all features of claims 9, 16, 20, 28, and 36. Consequently, the rejection of claims 9, 16, 20, 28, and 36 under 35 U.S.C. § 103(a) has been overcome.

The examiner has rejected claims 5, 12, 24, and 31 under 35 U.S.C. § 103(a) as being unpatentable over *Gipson*, in view of *Mansfield*, and further in view of *Lo et al.*, System and method for facilitating collaboration in connection with generating documents among a plurality of operators using networked computer systems, United States Patent No. 6,212,534 (issued April 3, 2001), (hereinafter "*Lo*"). This rejection is respectfully traversed.

The examiner has rejected claims 5, 12, 24, and 31 stating:

As per dependent claim 5, *Gipson* and *Mansfield* disclose the limitations similar to those in claim 1, and the same rejection is incorporated herein. *Gipson* fails to specifically disclose the method wherein the receiving step and modifying step are performed in a client data processing system. However, *Lo* suggests the method wherein the receiving step and modifying step are performed in a client data processing system (column 9, lines 5-47). It would have been obvious to one of ordinary skill in the art at the time of the applicant's invention to have combined *Gipson's* method with *Lo*, since it would have allowed a user to remotely author and modify documents (*Lo*: column 9, lines 5-47).

Office action dated June 13, 2006, p. 9.

Arguments advanced as to claim 5 below are also similarly applicable to claims 12, 24, and 31. Claim 5 depends from the independent claim 1, which Applicants have shown is not made obvious by *Gipson* and *Mansfield*, above. Claim 5 recites:

The method of claim 1, wherein the receiving step and the modifying step are performed in a client data processing system.

At least by virtue of the fact that claim 5 depends from claim 1, claim 5 is also not made obvious by *Gipson* and *Mansfield* by similar reasoning. Furthermore, *Lo's* entire disclosure fails to cure the deficiencies in *Gipson* and *Mansfield* highlighted above. Therefore, *Gipson*, in view of *Mansfield* and *Lo* fails to teach or suggest all features of claim 5. Consequently, the rejection of claims 5, 12, 24, and 31 under 35 U.S.C. § 103(a) has been overcome.

III Conclusion

It is respectfully urged that the subject application is patentable over *Gipson, Mansfield, Belanger* and *Lo* and is now in condition for allowance.

The examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,

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